



to the Pain Management Defendants under the Joint Tortfeasors Act of the State of New Jersey or the Comparative Negligence Act of the State of New Jersey.

**Answer to Crossclaim for Indemnification.**

1. Ameridose, LLC, admits the allegations in Paragraph 1 of the Crossclaim for Indemnification.

2. Ameridose, LLC, denies it is liable to Plaintiff for injuries alleged in his Complaint and further denies the allegations in Paragraph 2 of the Crossclaim for Indemnification.

3. Ameridose, LLC, denies the allegations in Paragraph 3 of the Crossclaim.

4. Ameridose, LLC, denies the allegations in Paragraph 4 of the Crossclaim.

**SEPARATE DEFENSE**

The Pain Management Defendants have failed to state a claim for relief.

WHEREFORE, having fully answered the Crossclaim, Defendant Ameridose, LLC,  
demands Judgment of this Court:

- A. Dismissing the Crossclaim against it, with prejudice;
- B. Awarding Ameridose, LLC the costs, expenses, and fees associated with defending this Crossclaim; and
- C. Granting such other and further relief, both legal and equitable, that the Court deems just and proper.

Respectfully submitted,

s/ Walter F. Timpone

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*Attorneys for Defendant Ameridose, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on January 10, 2013 using the ECF system that sent notification of this filing to all ECF-registered counsel of record via e-mail generated by the Court's ECF system.

*s/ Walter F. Timpone*

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*Attorney for Defendant Ameridose, LLC*